

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA**

STATE OF LOUISIANA,	*	CIVIL ACTION NO. 3:23-cv-00302-
	*	BAJ-SDJ
Plaintiff,	*	
	*	
versus	*	JUDGE: BRIAN A. JACKSON
	*	
SANOFI-AVENTIS U.S. LLC, et al.	*	
	*	MAGISTRATE JUDGE: SCOTT D.
Defendants	*	JOHNSON
	*	

**CONSENT MOTION FOR EXTENSION OF TIME
TO FILE BRIEFING IN OPPOSITION TO MOTION TO REMAND**

NOW INTO COURT, through undersigned counsel, come CaremarkPCS Health, L.L.C. and Express Scripts Administrators, LLC d/b/a Express Scripts (collectively, the “Removing Defendants”) to request an Order granting the Removing Defendants a fourteen (14) day extension of time to file briefing in opposition to the Plaintiff’s Motion to Remand, upon representing as follows:

1. On April 19, 2023, the Removing Defendants removed this case from the 19th Judicial District Court for the Parish of East Baton Rouge, State of Louisiana, to this Honorable Court. Doc. Nos. 1 and 4.
2. On May 19, 2023, Plaintiff filed a forty (40) page brief in support of its Motion to Remand raising numerous issues. Doc. No. 24.
3. Pursuant to Local Rule 7(f), the Removing Defendants’ opposition briefing is currently due on June 9, 2023. In light of the numerous issues raised in the Plaintiff’s Motion to Remand and supporting briefing, the Removing Defendants respectfully submit that there is good

cause to grant them an additional fourteen (14) days, or through and including June 23, 2023, to file their opposition briefing.

4. The Removing Defendants certify that the Plaintiff has consented to the requested extension of time.¹

WHEREFORE, CaremarkPCS Health, L.L.C. and Express Scripts Administrators, LLC d/b/a Express Scripts request that their Consent Motion for Extension of Time to File Briefing in Opposition to Motion to Remand be granted, and that the Court issue the accompanying Order extending the deadline for CaremarkPCS Health, L.L.C. and Express Scripts Administrators, LLC d/b/a Express Scripts to file their briefing in opposition to Plaintiff's Motion to Remand through and including June 23, 2023.

This 2nd day of June, 2023

Respectfully submitted,

/s/ James A. Brown

James A. Brown (Bar # 14101)
Melanie Derefinko (Bar # 37658)
Courtney Harper Turkington (Bar # 38255)
LISKOW & LEWIS
701 Poydras Street, Suite 5000
New Orleans, Louisiana 70139-5099
Telephone: (504) 581-7979
Facsimile: (504) 556-4108
jabrown@liskow.com
mderefinko@liskow.com
chturkington@liskow.com

Enu Mainigi (*pro hac vice*)
Craig Singer (*pro hac vice*)
R. Kennon Poteat III (*pro hac vice*)
A. Joshua Podoll (*pro hac vice*)
WILLIAMS AND CONNOLLY LLP

¹ In exchange for the Plaintiff's consent to the Removing Defendants' requested extension, the Removing Defendants have consented in advance to the Plaintiff's filing of reply briefing and to an extension of seven (7) days beyond the 14-day deadline to file the same.

680 Maine Avenue S.W. Washington, DC 20024
Tel: (202) 434-5000
Fax: (202) 434-5029
emainigi@wc.com
csinger@wc.com
kpoteat@wc.com
apodoll@wc.com

***Attorneys for CaremarkPCS Health, L.L.C. and
CVS Health Corp.***

/s/ Keith W. McDaniel
Keith W. McDaniel (Bar No. 17992)
**MCCRANIE SISTRUNK ANZELMO HARDY
MCDANIEL & WELCH LLC**
195 Greenbriar Blvd, Suite 200
Covington, LA 70433
Tel: (504) 846-8330
Fax: (800) 977-8810
Email: kmcdaniel@mcsalaw.com

Jason R. Scherr (*pro hac vice*)
Lindsey T. Levy (*pro hac vice*)
Patrick A. Harvey (*pro hac vice*)
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Ave. NW
Washington, DC 20004
(202) 739-3000 (p)
(202) 739-3001 (f)
jr.scherr@morganlewis.com
lindsey.levy@morganlewis.com
patrick.harvey@morganlewis.com

***Attorneys for Express Scripts Administrators, LLC
d/b/a Express Scripts***

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of June, 2023 I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Notice of this filing will be sent to all counsel of record registered to receive electronic service by operation of the Court's electronic filing system.

/s/ James A. Brown